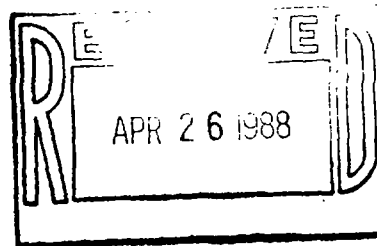


Bill Sullivan



ESCOR, INC.

540 Frontage Road, Suite 211 Northfield, Illinois 60093

312/501-2190

February 8, 1988

Mr. Scott Springer
WESTON SPERE
River Center
111 North Canal Street
8th Floor, Suite 855
Chicago, IL 60606

EPA Region 5 Records Ctr.



242130

RE: Asbestos Evaluation - Dayton Tire and Rubber Plant - EPA Contract
68-01-7367
ESCOR Job No. 608

Dear Mr. Springer:

The purpose of this letter is to report the results of ESCOR's estimate of the quantity of asbestos which must be removed or stabilized at the Dayton Tire and Rubber facility in Dayton, Ohio. This work effort was in response to Dr. Peter B. Lederman's Vice President of WESTON Inc. February 5, 1988 authorization letter, and the sub-contractor agreements between ESCOR and WESTON. The work effort included two days of on-site survey and evaluation of the data developed to provide WESTON with rough estimates of the quantities of asbestos and asbestos contaminated waste that may be generated at the facility.

The results were reported in three categories. They are:

- Loose and friable asbestos: This includes both asbestos and asbestos contaminated waste at various locations in the building and the material which must be removed from pipes, tanks or surfaces.
- Estimated asbestos insulating items requiring encapsulization: This category includes the lineal footage of piping which will require some form of covering to reduce the asbestos fiber release.
- Quantity of asbestos waste to be generated: This category includes the contaminated plastic sheeting, protective suits, filters, etc. which will be generated during the removal of asbestos containing materials or asbestos waste piles. This grouping does not include asbestos waste itself.

On Saturday, February 6, 1988, Dr. R. E. Zimmerman, Mr. William Otto and Mr. Tom Sieger of ESCOR INC met with Mr. Scott Springer and other personnel of WESTON and the USEPA at the site.

Due to time constraints two teams, each consisting of a ESCOR and a WESTON representative, inspected the facility. The WESTON representative directed ESCOR personnel to the suspect areas for evaluation.

All quantities are based on visual estimates, due to time and working conditions, no physical measurements of the dimensions of pipe, piles or tanks were made.

It is ESCOR'S understanding that the asbestos materials response effort direction is stabilization of the site and not to render the site asbestos free. As such, the amount of removal was minimized and covering of the material is maximized.

There are a number of limitations and qualifications in the estimates provided by this inspection. First, there were a limited number of analytical sample results available and many materials were assumed to be asbestos. There are some materials, such as the sprayed on fireproofing in the Northwest room in the power plant, that may not be asbestos material. Second, in a number of instances, because of the unsafe walkways, ceilings or access limitations, the material was viewed from a great distance or not at all. An example of this would be in the four story area in the power room where walkways and guardrails were deteriorated or missing.

The quantities reported for two of the three categories are in ranges. The second category, the total lineal footage of asbestos insulating material that will require encapsulization is approximately 1700 lineal feet. The other two categories are given in ranges and are function of conditions which must be determined or evaluated in the future.

First the total volume of friable and loose asbestos has two ranges: One is 120 to 150 cubic yards of compact and the other 190 to 300 cubic yards of loose materials. This material will include the numerous piles of asbestos and asbestos contaminated debris in the building, the pipe lagging to be removed, the glove bags, and surfacing materials to be removed from the paint shop and power house area.

The debris which exists on the plant floor must be removed in plastic bags and disposed of as asbestos containing waste. Pipelagging which is falling from the pipes must be removed using the glove bag technique. The material which exist on the paint shop and the power plant can be removed or possibly stabilized with encapsulants. Tests need to be performed on the surfacing materials to determine if they are asbestos containing materials. The quantity of material which will be disposed will vary depending on what is removed and the compactness of the material when disposed.

The third category is the total volume of asbestos associated waste. This will include plastic used for enclosures, suits, filter materials and other items. Total quantity of waste in this category is estimated to be from 25 to 75 yards, depending on the need to remove the large surfacing areas, the techniques used, and the compactness of the waste.

Total number of glove bags required to remove the pipe insulation is estimated to vary from 400 to 600 depending on the techniques used and the quantity of the material that can be placed in one glove bag.

Another qualification, is that two of the six roof cooling towers were examined. The asbestos containing drip media was not considered friable by the investigators. This material can remain in place under the stabilization concept.

If you have any questions concerning this report please do not hesitate to contact me.

Very truly yours,



Eric Zimmerman, Ph.D., P.E.
President ESCOR INC.